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State of Kansas . . . John Carlin, *Governor*

DEPARTMENT OF HEALTH AND ENVIRONMENT

Barbara J. Sabol, *Secretary*

Forbes Field
Topeka, Kansas 66620
913-862-9360

November 6, 1984

Mr. Chuck Trombold
Process Engineer
Ried Supply Company
P.O. Box 11365
Wichita, Kansas 67202

Dear Mr. Trombold:

This letter is in regard to our October 30, 1984 inspection of your hazardous waste facility and your Part B Hazardous Waste Permit application.

You will find attached the EPA-KDHE comments on the last round of information you submitted for your Part B application. You must submit a complete response to these comments no later than December 6, 1984. Failure to supply a complete and timely response will result in a compliance action against Ried Supply with penalties.

You may submit any of the required information in advance for our review and comment. Should you have any questions about this matter, please contact our office.

Sincerely,

John S. Ramsey

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Hazardous Waste Section
Bureau of Waste Management

JSR/bsk/74-BB
cc: Dale Stuckey
Karen Flournoy

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ATTACHMENT I

1. The March 28, 1984, revised Part A includes tank storage capacity of 12,500 gallons. The Part B application addresses two tanks with total capacity of 9,000 gallons. This discrepancy should be corrected.

2. Is there any possibility that wastes to be to be handled by Reid could contain metals above the EP toxicity limits? If yes, additional waste codes should be included in the Part A and Part B. The application mentions metals content of the waste with regard to waste sent to General Portland.

3. The July 9, 1984, response refers to an enclosed map showing the facility boundaries. We did not receive a copy of this map with the July 9 response.

4. According to the drawing titled "Location of Emergency Equipment" there is no telephone in area C (drum storage area) or bulk storage area. Section 264.32 requires an internal communication or alarm system and a telephone or two-way radio. It is unclear in the permit application if these requirements are met at all the hazardous waste areas.

5. Has the Wichita Fire Department concurred on the buffer zone waiver request? A copy of the letter received from the Fire Department regarding the waiver request must be included in the Part B application.

6. A statement should be provided which will insure that after a spill or fire all emergency equipment is cleaned and fit for use before operations are resumed.

7. The Wichita Fire Department has requested revisions to the contingency plan. They want to insure that the emergency coordinator notifies them first in case of a spill, fire, or explosion and they in turn will notify the National Response Center. Reid Supply should be aware, however, that it is their obligation to contact the National Response Center in the event of a release or fire which could threaten human health or the environment. The Part B application must also contain evidence that the Fire Department concurs with the revised ~~closure~~ contingency plan.

8. The applicant must maintain a copy of the contingency plan at the facility.

9. The application indicates that any waste found to be reactive or incompatible will be stored in a small separate diked area. It is our understanding that this area is included in the container storage area. The application should be revised to clarify how and where ignitable, reactive or incompatible waste will be stored.

10. We have reviewed the revised training program submitted on July 19, 1984. A modular approach to training is acceptable provided all regulatory requirements are addressed, including for example, job titles and duties, introductory and continuing training and documentation that training has been given.

11. The facility shall be in compliance with all Part 264 regulatory requirements, with the possible exception of secondary containment prior to issuance of a RCRA permit. As we have advised you a number of times, the permit can contain a compliance schedule for construction of the secondary containment system.

12. The closure cost estimate does not address transportation costs for hazardous waste disposal. The estimate should address separately disposal and transportation costs.

13. Does your facility own all equipment necessary for complete decontamination, or will rental costs be incurred?

14. The July 9, 1984, response did not include a revised closure plan. A revised closure plan must be submitted with your response to this letter.

15. The following comments result from our review of the waste analysis plan and waste blending operation. Please provide complete detailed responses to these comments.

    A. The July 9 response indicates that each individual waste stream will be analyzed. Results of the analyses must be kept onsite and available for review by compliance inspectors. The Part B application should contain a respresentative number of the results of analyses.

    B. Comment 18.B. of the July 9 response states "The annual analysis presently includes analysis for halogen content for every waste-stream when the analysis is performed by Systech." Does this statement mean that analysis for halogen content is only conducted by Systech? This statement needs to be further clarified. It is our understanding that the fingerprint analysis of the individual waste streams prior to blending would include halogen content.

    C. For customers generating less than 10 drums of waste annually we will require a detailed analysis to be performed every two years or earlier if the process generating the waste or the waste changes.

D. Comment 19.B. of your July 9 response states you believe wastes with a heating value of less than 8,000 BTU/lb should be sent to Systech. As we have advised you, wastes with a heating value of less than 8,000 BTU/lb cannot be blended into a fuel to be used by Systech. Violation of the enforcement guidance published in the March 16, 1983, Federal Register would subject a facility to a compliance action. This is why we have asked for development of a recordkeeping system so you can demonstrate which waste-streams are blended into fuels, the source of individual wastestreams and analyses of wastestreams. This information, at a minimum, is necessary to demonstrate compliance with the enforcement guidance. In response to comment 19.C. EPA and KDHE will not allow Reid to blend wastes with a heating value of less than 8,000 BTU/lb for shipment to Systech. The Part B application must clearly delineate how wastes with a heating value of less than 8,000 BTU/lb and wastes with a heating value of greater than 8,000 BTU/lb will be handled.

E. Page 1 of the August 7, 1984, waste analysis plan states "If a wastestream is received at the facility and transported to another facility without going through any processing, a second analysis is not necessary." Please explain this statement further as it applies to your facility. How will Reid handle and store this waste, i.e., how will you know that the waste in the drum is properly identified on the manifest? It is very likely that the other facility could require additional analyses.

F. Is there a possibility that wastes could contain metals at EP Toxic levels for metals other than those listed on page 1 of the waste analysis plan?

G. The non-blendable paint solids should be analyzed annually.

H. Table 1 should also include applicable EP Toxic metals.

I. Figure 1 should specify what happens to still bottoms generated from onsite distillation. Also, the waste analysis plan should address analyzing the still bottoms.

J. Is there any kind of quality assurance/quality control procedures for sampling and analysis?

K. The SW-846 sampling methods referred to in Section 264.13(b)(3) shall be used. Use of a sampling method not specified in SW-846 requires submittal of a petition to the Administrator and approval of that petition.

L. Will all drums from each generator be sampled for fingerprint or detailed analysis?

M. It may be necessary to tailor the fingerprint analysis for specific wastestreams.

N. What type of agreements have been made with your customers regarding tolerance levels of waste constituents and procedures for handling the waste if the tolerance levels are exceeded?

O. We have previously provided you with information on waste analysis plans from "Permit Applicant's Guidance Manual for the General Facility Standards of 40 CFR 264." As we advised you previously, this manual includes a detailed discussion on waste analysis plans for offsite facilities. Again, we strongly recommend that you use this information in developing a complete waste analysis plan. If you cannot develop a complete waste analysis plan it will be necessary for you to obtain assistance from a competent consulting firm.

16. The application should include a more detailed description of your processes which includes a flow chart, flow rates, timing and specific processes.

17. What are the outside dimensions of Building C?

18. Please submit the calculations for the containment system capacity.

Tank Standards

19. In the future the ultrasonic thickness measurements should be shown on a scale drawing of each tank.

20. It appears from the information submitted that only the two 4,500 gallon tanks are to be permitted. It will be Reid's obligation to operate the process tanks in such a manner that they are not considered storage units.